

Pursuant to FCC Public Notice Report No. 2567, August 8, 2002, the FCC gave notice of a request for an amendment of the Commission's rules to define "captured" and "new" subscriber lines for purposes of receiving universal service support (RM-10522). The notice requested comments not later than September 7, 2002.

The Washington Utilities and Transportation Commission (WUTC) only became aware of this notice on September 6, 2002. The WUTC intends to file comments regarding the issues presented in the request for rulemaking filed by NTCA.

Our comments will discuss the application of competitive and technological neutrality as they relate to the requested rulemaking. Our comments will also discuss the sufficiency of support for all providers eligible to receive high-cost support.

The WUTC has designated three wireless carriers as eligible Telecommunications carriers ("ETCs"). See WUTC Docket Nos. UT-970345, UT-023033, and UT-023040 (<http://www.wutc.wa.gov>). The WUTC has also designated 24 incumbents and three new local exchange carriers as ETCs, as well.

The WUTC has also required rural incumbent local exchange carriers to disaggregate federal universal service support by exchange. See UT-013058 and UT-023020.

Any alteration of the definitions of "captured" or "new" subscriber lines could have a significant effect upon all ETCs in Washington.